

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEVELLE SPENCER,	)	
	)	
Plaintiff,	)	08 C 903
	)	
vs.	)	Honorable Judge
	)	Robert Gettleman
COOK COUNTY SHERIFF THOMAS DART,	)	
DIRECTOR CCDOC SALVADOR GODINEZ,	)	
SUPERINTENDENT SNOOKS,	)	
SHERIFF MORGAN (CORRECTION),	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

Pursuant to LR83.17 of the United States District Court for the Northern District of Illinois, Eastern Division, the undersigned attorney, Kevin Frey, Assistant State's Attorney of Cook County, moves this Honorable Court for leave to withdraw Steven L. Satter as attorney of record for Defendants Thomas Dart, Salvador Godinez, Supt. Snooks, and Officer Morgan in this action and for leave for the undersigned attorney to substitute as counsel and to file his appearance. In support of this motion, the movant states as follows:

1. Defendants Thomas Dart, Salvador Godinez, Supt. Snooks, and Officer Morgan are represented in this matter by the Office of the Cook County State's Attorney. The State's Attorney assigned to represent Defendants in this cause of action is Steven L. Satter.

2. On August 18, 2008, the Torts and Civil Rights Litigation Section of the Office of the State's Attorney of Cook County reassigned litigation responsibilities for this case to Assistant State's Attorney Kevin Frey.

3. Kevin Frey is a duly licensed attorney in the State of Illinois.

4. Plaintiff will not be prejudiced by a substitution of counsel.

5. If allowed by this Court to file my appearance, Kevin Frey seeks fourteen (14) days to answer or otherwise plead on behalf of the Defendants.

WHEREFORE, the undersigned respectfully requests that this Honorable Court grant leave to Steven L. Satter to withdraw as attorney for Defendants and allow Kevin Frey to substitute as attorney and enter his appearance as counsel of record for Defendants Thomas Dart, Salvador Godinez, Supt. Snooks, and Officer Morgan and ask for fourteen (14) days to answer or otherwise plead.

Respectfully Submitted,

RICHARD A. DEVINE  
State's Attorney of Cook County

By: /s/Kevin Frey  
Kevin Frey  
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